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*Local Counsel for County of Alameda  
Treasurer- Tax Collector*

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN RE: CIRCUIT CITY STORES, INC., et al.

Case No. 08-35653-KRH  
Jointly Administered  
Chapter 11 Proceedings

Debtor(s).

**MOTION FOR ADMISSION OF  
JOHN THOMAS SEYMAN PRO HAC VICE**

Anne G. Bibeau (“Movant”) hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing John Thomas Seyman (the “Applicant”) of the Office of the County Counsel, County of Alameda, in Oakland, California, to practice *pro hac vice* in the above-referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (collectively, the

“Bankruptcy Case”) to represent County of Alameda Treasurer – Tax Collector. In support of this motion, the Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. The Applicant is a member in good standing of the bar of the State of California, and is admitted to practice before the United States District Court for the Northern and Eastern Districts of California. There are no disciplinary proceedings pending against the Applicant in any jurisdiction in which he is admitted to practice. *See Exhibit A attached hereto.*

3. Movant requests that this Court authorize the Applicant to file pleadings in, to appear and be heard at hearings concerning, and to participate otherwise in the Bankruptcy Case and related proceedings on behalf of County of Alameda Treasurer – Tax Collector.

4. Movant and this firm will serve as co-counsel with the Applicant in the Bankruptcy Case and related proceedings.

5. The Applicant’s Application is appended to this Motion as Exhibit A and incorporated by reference herein.

6. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notices in the Bankruptcy Case.

**WHEREFORE**, Movant respectfully requests that this Court enter an Order authorizing John Thomas Seyman to appear *pro hac vice* in the Bankruptcy Case and

related proceedings and grant Movant such other and further relief as is just.

Dated: June 7, 2012

Respectfully submitted,

/s/ Anne G. Bibeau, Esq.  
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#### **CERTIFICATE OF SERVICE**

I certify that on June 7, 2012, I will file the preceding with the Court's CM/ECF system which will cause a copy of it to be electronically served on all users registered to receive electronic notice in this case.

/s/ Anne G. Bibeau, Esq.  
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